

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (FLW) (LHG)

***THIS DOCUMENT
RELATES TO ALL CASES***

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, Esq., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs in the above-captioned matter.

2. I submit this Certification based on personal knowledge in support of the Plaintiffs' Steering Committee's Expedited Motion to Compel J&J to Produce the Blount Report for *In Camera* Inspection by the Court in Advance of the Upcoming Daubert Hearing.

3. Attached hereto as Exhibit 1 is a true and correct copy of *Olson* Trial Exhibit 11 (JNJNL61_000095942).

4. Attached hereto as Exhibit 2 is a true and correct copy of *Olson* Trial Exhibit 12 (JNJNL61_000014431).

5. Attached hereto as Exhibit 3 is a true and correct copy of Excerpts of IARC (2012) *Monographs on the Evaluation of Carcinogenic Risks to Humans: Volume 100C – Asbestos (Chrysotile, Amosite, Crocidolite, Tremolite, Actinolite and Anthophyllite*. Lyon, France: International Agency for Research on Cancer.

6. Attached hereto as Exhibit 4 is a true and correct copy of JNJ 000064591.

7. Attached hereto as Exhibit 5 is a true and correct copy of an Excerpt of the Trial Transcript in *Olson v. Johnson & Johnson Consumer, Inc., et al.* dated April 30, 2019.

8. Attached hereto as Exhibit 6 is a true and correct copy of JNJNL61_000052427.

9. Attached hereto as Exhibit 7 is a true and correct copy of the Deposition of Alice M. Blount, Ph.D., dated April 13, 2018.

10. Attached hereto as Exhibit 8 is a true and correct copy of Excerpt of the Trial Transcript in *Olson v. Johnson & Johnson Consumer, Inc., et al.* dated February 15, 2019.

11. Attached hereto as Exhibit 9 is a true and correct copy of Excerpt of the Trial Transcript in *Olson v. Johnson & Johnson Consumer, Inc., et al.* dated May 10, 2019.

12. Attached hereto as Exhibit 10 is a true and correct copy of JJCI Privilege Log dated June 28, 2017.

13. Attached hereto as Exhibit 11 is a true and correct copy of an Excerpt from Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc.'s Reply in Support of Motion to Exclude Plaintiffs' Experts' Asbestos-Related Opinions.

14. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

/s/ P. Leigh O'Dell
P. Leigh O'Dell

Dated: July 3, 2019